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June 9, 2022

VIA ECF

Honorable Katherine H. Parker
United States Magistrate Judge
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: Darlene Oliver v. City of New York, et al.,
19 Civ. 2321 (AT) (KHP)

Application Denied. The case management conference shall proceed as scheduled. The Court will hear any application to amend the discovery schedule at the conference.

SO ORDERED:

Katharine H. Parker
HON. KATHARINE H. PARKER
UNITED STATES MAGISTRATE JUDGE

6/13/2022

Your Honor:

I am the attorney assigned to represent the defendants in this action. The parties write to: 1) provide the Court with a status report 2) request an enlargement of time to complete discovery; and 3) to request an adjournment of the status conference scheduled for June 14, 2022.

These requests are made to facilitate ongoing discussions between the parties regarding potential resolution of this case. This case was assigned to the undersigned in March of this year. While considerable discovery had been completed up to that point, there are remaining items of document discovery and at least two contemplated depositions outstanding. Due to the parties' schedules, and the need for the undersigned to become familiar with this case after its transfer, these items have not been completed. Counsel have discussed a schedule to complete these items, which contemplates ongoing settlement discussions. The defendants are in the process of re-evaluating their settlement posture and the parties expect to ascertain within the next thirty days whether further discussions will be productive.

For the foregoing reasons, the parties respectfully request that the Court enlarge their time to complete fact discovery up to and including September 30, 2022. The length of this extension is due to the parties' litigation, trial, and personal commitments over the next three months.¹ The parties further respectfully request that the Court fix a deadline for the parties to

¹ The undersigned is scheduled for trial on various matters in June, July, August, and September. Plaintiff's counsel will be unavailable during the month of August due to previously scheduled travel.

provide a status report to the Court regarding the status of settlement discussions, and any request for a settlement conference, by July 15, 2022.

The parties thank the Court for its consideration.

Respectfully submitted,


/s/

Hannah V. Faddis
Senior Counsel
Special Federal Litigation Division

cc: **VIA ECF**
All counsel of record